



**ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT
(AHWMMA)**

Compliance Evaluation Inspection (CEI) Report

1) Author of Report

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Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
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2) Facility Information

Hyundai Sungwoo Auto USA Corporation
6177 Perimeter Parkway
Montgomery, Montgomery County, Alabama 36116

EPA ID Number: ALR000058271

NAICS Code: 423990

Telephone: (334) 356-8992

3) Responsible Officials

Sungwon Yoon, Senior Manager – Hyundai Sungwoo
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Telephone: (334) 356-8571

4) Inspection Participants

Mr. Yoon
Mr. Jin Pyo Lee, Assistant Manager – Hyundai Sungwoo
Sunkoo Kwon, Controller – Hyundai Sungwoo
Ms. Paula Whiting, Environmental Engineer
US Environmental Protection Agency - Region 4
Ms. L. J. Knickerbocker

5) Date of Inspection

March 22, 2016

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations.

7) Purpose of Inspection

The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.



8) Facility Description

Hyundai Sungwoo Auto USA Corporation (hereinafter "Hyundai Sungwoo") imports and charges lead/acid automotive batteries as a Tier 1 supplier for Hyundai Motor Manufacturing Alabama, LLC and Kia Motors Manufacturing Georgia, Inc. The facility consists of a single warehouse building. At the front, just to the rear of the administrative area, there is a Hazardous Waste Storage Area, where defective batteries are disassembled. Near the center there is a large charging station, capable of charging several dozen batteries at one time; the bulk of the building provides storage for the batteries before and after charging. See Photograph #1 for an aerial view of the site.

In its most recent notification of regulated waste activity (ADEM Form 8700-12, dated August 4, 2015) Hyundai Sungwoo identified itself as a large quantity generator of corrosive (D002) hazardous waste.

9) Observations

On March 22, 2016, Ms. Whiting and I (hereinafter "we" or "us") arrived at the site at 8:20 a.m. and proceeded to the front office, where we met the facility representatives. We introduced ourselves and explained the purpose of the inspection. We proceeded to a conference room where we held the opening meeting, and where the facility representatives provided background information about the site and an overview of its operations.

The site was established in 2004 and has operated continuously since that time. It currently operates 16 hours per day, in two 8-hour shifts. It is in operation five or six days per week, depending on the demand from the vehicle assembly plants. It has 15 employees; three of these employees may handle hazardous waste on a routine basis.

According to Mr. Lee, the majority of the wastes handled at the site are damaged lead/acid automotive batteries and battery acid (EPA hazardous waste number D002). Most of the batteries handled at the site are imported from Korea, but the site also handles "JCI" (Johnson Controls, Inc.) batteries, which are manufactured in the United States. All defective JCI batteries are returned to the manufacturer, even if the damage is purely cosmetic. Initially, Mr. Lee stated that defective but intact imported batteries were managed as universal waste and that the non-intact ones were managed as hazardous waste, but he later indicated that this was not the case. All defective imported batteries are sold to a vendor, Eagle Batteries, located in Montgomery, Alabama, either for continued use (cosmetic damage only) or for scrap value (for batteries that will not take or hold a charge). The drained acid is sold to Eagle Batteries for continued use.

Following the opening meeting, the facility representatives accompanied us on a tour of the site, during which we conducted the walk-through inspection.

During the walk-through inspection, we noted the following:

Charging Room

There is one large charging table in this area. The table can accommodate several dozen batteries at a time; once charged, they are placed back on pallets and moved to the warehouse area pending shipment off-site. No issues were observed in this area.

Scrap Battery Areas

Intact batteries with either cosmetic damage or defective cells are stored in one of two areas to the right of the charging table. The batteries are segregated by origin. Since the JCI batteries are all returned to the manufacturer, they are stored away from the imported batteries, which are all sold to a local vendor. All batteries are marked with color coded labels that denote the nature of the damage, then stacked on pallets. The imported batteries are shipped out on the pallets. Each layer is covered by a sheet of cardboard and



the pallets are built up three layers high. Mr. Lee told us that completed pallets are shrink wrapped. The JCI batteries are staged on pallets, but are placed in lined fiberboard shipping containers prior to shipment off-site.

We saw no indications of spills or releases. None of the batteries or pallets was marked as universal waste; they also lacked dates. According to Mr. Lee, Eagle Battery collects the imported batteries every month or two. The shipments to JCI are made on a similar schedule. See Photograph #2 through Photograph #4.

Hazardous Waste Storage Area

The Hazardous Waste Storage Area is a fenced enclosure located in the Charging Room in front of the charging table. Batteries that have cracked casings or that will not take or hold a charge are brought to this area, where they can be disassembled and drained of acid. The acid is collected in 15-gallon close-top plastic drums and sold to Eagle Battery for continued use. The disassembled carcasses are placed in fiberboard boxes with heavy plastic liners.

The drum of battery acid was not closed – the bung was open and a pouring funnel was in place, but no material was being added or removed. The lined fiberboard box was empty. See Photograph #5 through Photograph #7.

Maintenance Area

Paint and other materials for minor repairs and maintenance are stored in this room. No wastes were present at the time of the inspection and no issues were noted.

Records Review

During the records review, we requested the following documents and records:

- Hazardous Waste (HW) manifests;
- Land disposal restriction (LDR) notices;
- HW determinations;
- Documentation of monthly hazardous waste generation ;
- Written Waste Minimization plan;
- Weekly HW storage area inspection logs;
- Written description of the HW management and emergency response training program;
- Training requirements for all HW management-related jobs;
- Documentation of initial HW management training and annual refresher/update;
- Job titles and job descriptions for all HW workers – with the names of employees filling each job;
- Contingency plan;
- Documentation of arrangements with police, fire, and emergency responders; and
- Notice to local hospitals and the local branch of ADEM's Field Operations Division.

According to the facility representatives, hazardous waste determinations are based on generator knowledge. Based on Mr. Kwon's records, Hyundai Sungwoo sells roughly 77 intact but damaged batteries to Eagle Battery each month. In addition, the site has about seven batteries with cracked casings (230 pounds) each month. These are managed as hazardous waste.

All batteries appear to have been shipped off-site using bills of lading. Other than the bills of lading, and the records related to the number of intact batteries and the weight of scrap batteries sold or returned each month, there was no documentation of waste related activities at the facility.



10) **Summary**

The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code. Although Hyundai Sungwoo last notified as a large quantity generator, it was unable to any of the documents or records that a large quantity generator is required to maintain.

The following potential areas of noncompliance were noted at the time of the inspection:

- One container of drained battery acid was not closed or marked.
- No hazardous waste profiles, manifests, or land disposal restrictions one-time notification/certification were available for review.
- The facility was unable to furnish any evidence proving that it had conducted weekly inspections of the hazardous waste storage area.
- The facility does not have a training program and has not provided hazardous waste training to any of its employees.
- The facility's contingency plan did not include home addresses.
- The facility did not maintain documentation demonstrating attempts to make arrangements with local authorities to familiarize them with the facility.

Following the inspection, we met with Mr. Yoon, Mr. Lee, and Mr. Kwon for a closing meeting. We reviewed our observations, and gave them the opportunity to ask questions. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* that addressed the areas of potential noncompliance noted during the inspection. We left the top copy of the form and several guidance documents with facility personnel and departed the site at 11:10 a.m.

11) **Signed**

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

May 26, 2016

Date

12) **Concurrence**

Clethes Stallworth, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

May 26, 2016

Date

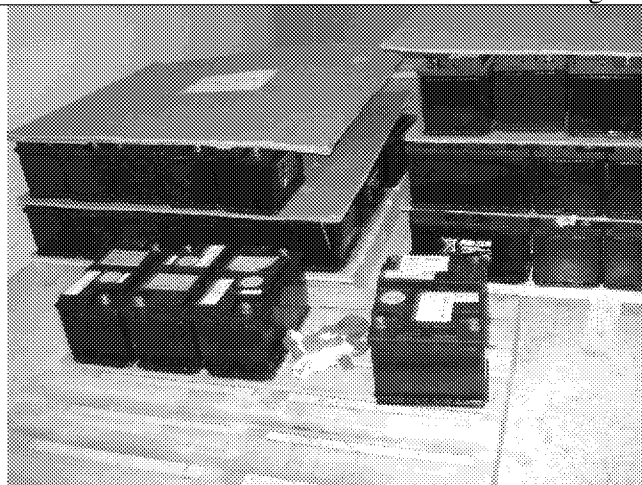
Attachment - Photo Log

46147 ALR000058271 101 20160526 HWTM Trip Report

ATTACHMENT – HYUNDAI SUNGWO AUTO USA CORP. PHOTO LOG



1. Google Maps view of site



2. Scrap Battery Area



3. Scrap JCI Batteries



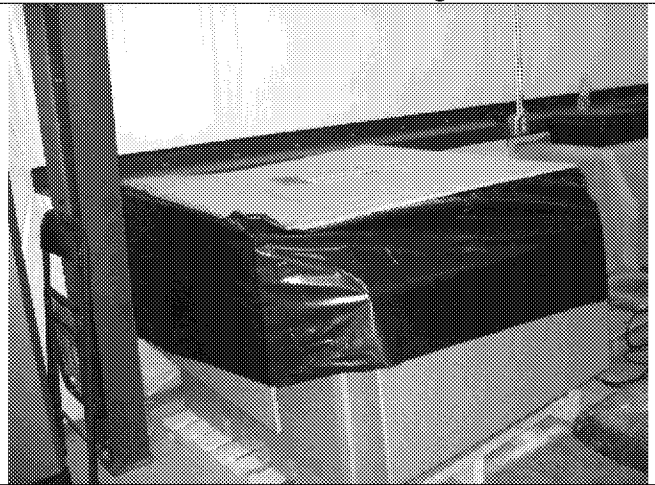
4. Boxes for intact JCI batteries



5. Hazardous Waste Storage Area



6. Drained battery acid



7. Box for JCI batteries with broken cases - empty